

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

REX VENTURE GROUP, LLC d/b/a  
ZEEKREWARDS.COM, and PAUL BURKS,

Defendants.

Case No. 3:12-cv-519

**NON-PARTY BANCA COMERCIALA VICTORIABANK SA'S  
MOTION TO VACATE ORDER STAYING DISSOLUTION OF FEBRUARY 12, 2016  
FREEZE ORDER**

Non-Party Banca Commerciale Victoriabank SA (“Victoriabank”), appearing specially, respectfully moves this Court to vacate its May 25, 2017 Order Staying Dissolution of the February 12, 2016 Freeze Order (the “Stay Order” [ECF No. 606]). Alternatively, Victoriabank requests that this Court require the Receiver to post a bond pursuant to Fed. R. Civ. P. 62(c) in the amount of \$13,174,015.48. Victoriabank also requests that the Court recommend to the Fourth Circuit that the Receiver’s appeal be expedited.

In support of this motion, Victoriabank relies on its supporting memorandum of law filed contemporaneously herewith.

Respectfully submitted, this 30<sup>th</sup> day of May, 2017.

By: s/ Kiran H. Mehta

Kiran H. Mehta  
NC Bar No. 11011  
TROUTMAN SANDERS LLP  
One Wells Fargo Center  
301 S. College Street, Suite 3400  
Charlotte, NC 28202  
Telephone: 704.998.4072  
Facsimile: 704.998.4051  
Email: [kiran.mehta@troutmansanders.com](mailto:kiran.mehta@troutmansanders.com)

Lindsey B. Mann (*Admitted Pro Hac Vice*)  
Kathleen M. Campbell (*Admitted Pro Hac Vice*)  
TROUTMAN SANDERS LLP  
5200 Bank of America Plaza  
600 Peachtree Street, N.E.  
Atlanta, GA 30308-2216  
Phone: (404) 885-3000  
Facsimile: (404) 885-3900  
Email: [lindsey.mann@troutmansanders.com](mailto:lindsey.mann@troutmansanders.com)  
[kathleen.campbell@troutmansanders.com](mailto:kathleen.campbell@troutmansanders.com)

Attorneys for Movant Banca Comerciala  
Victoriabank, S.A.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NON-PARTY BANCA COMERCIALA VICTORIABANK SA'S MOTION TO VACATE ORDER STAYING DISSOLUTION OF FEBRUARY 12, 2016 FREEZE ORDER** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 30<sup>th</sup> day of May, 2017.

s/ Kiran H. Mehta  
Kiran H. Mehta  
North Carolina Bar No. 11011